

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

January 9, 2020

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs' Executive Committees ("PECs"), with the consent of the Department of Justice ("DOJ"), write to respectfully request the Court's approval of a brief extension of the January 10, 2020 deadline for the Plaintiffs to submit their motion to compel and memorandum of law directed to the Federal Bureau of Investigation ("FBI"), and a minor modification of the briefing schedule endorsed by Your Honor's Order at ECF No. 5358.

Last evening, one of the members of the PECs who has taken a leading role in the drafting of the Plaintiffs' submission due tomorrow unfortunately experienced a family medical emergency that requires his attention today and tomorrow. The PECs conferred with the DOJ this morning concerning the matter and the DOJ has consented to a four-day extension of the January 10 deadline to January 14. The parties have further agreed to extend each of the remaining deadlines in the briefing schedule by four days as follows:

1. Plaintiffs will file their motion to compel and memorandum of law in support of same, not to exceed 25 pages, on or before January 14, 2020;
2. The FBI will file its cross motion for a protective order and memorandum of law in opposition to Plaintiffs' motion to compel and in support of the motion for a protective order, not to exceed 35 pages, on or before February 11, 2020;

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3. Plaintiffs will file their memorandum of law in opposition to the FBI's motion for a protective order and in further support of their motion to compel, not to exceed 25 pages, on or before February 25, 2020; and
4. The FBI will file its reply brief in support of its motion for a protective order, not to exceed 15 pages, on or before March 10, 2020.

Accordingly, the PECs respectfully request that the Court grant the PECs' extension request and the modified briefing schedule as set forth above.

We thank Your Honor in advance for the Court's consideration of this request.

Respectfully submitted,

COZEN O'CONNOR

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*On behalf of the MDL 1570 Plaintiffs' Exec.
Committees*

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*On behalf of the MDL 1570 Plaintiffs' Exec.
Committees*

cc: The Honorable George B. Daniels (via ECF)
All MDL Counsel of Record (via ECF)